

[If you need additional space for ANY section, please attach an additional sheet and reference that section.]

UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

RECEIVED

SEP 17 2024

THOMAS G. BRUTON
CLERK, U.S. DISTRICT COURT

Hannibal Mu Bey

Plaintiff(s),

vs.

City of Chicago

Brandon Johnson

Defendant(s).

1:24-cv-08530

Judge Lindsay C. Jenkins

Magistrate Judge Jeffrey Cole

random cat 2

COMPLAINT FOR VIOLATION OF CONSTITUTIONAL RIGHTS

This form complaint is designed to help you, as a pro se plaintiff, state your case in a clear manner. Please read the directions and the numbered paragraphs carefully. Some paragraphs may not apply to you. You may cross out paragraphs that do not apply to you. All references to "plaintiff" and "defendant" are stated in the singular but will apply to more than one plaintiff or defendant if that is the nature of the case.

1. This is a claim for violation of plaintiff's civil rights as protected by the Constitution and laws of the United States under 42 U.S.C. §§ 1983, 1985, and 1986.
2. The court has jurisdiction under 28 U.S.C. §§ 1343 and 1367.
3. Plaintiff's full name is Hannibal Mu Bey.

If there are additional plaintiffs, fill in the above information as to the first-named plaintiff and complete the information for each additional plaintiff on an extra sheet.

[If you need additional space for ANY section, please attach an additional sheet and reference that section.]

4. Defendant, City of Chicago, is
(name, badge number if known)

☐ an officer or official employed by City of Chicago;
(department or agency of government)

or

☐ an individual not employed by a governmental entity.

If there are additional defendants, fill in the above information as to the first-named defendant and complete the information for each additional defendant on an extra sheet.

5. The municipality, township or county under whose authority defendant officer or official acted is City of Chicago, Cook. As to plaintiff's federal constitutional claims, the municipality, township or county is a defendant only if custom or policy allegations are made at paragraph 7 below.

6. On or about _____, at approximately _____ ☐ a.m. ☐ p.m.
(month, day, year)
plaintiff was present in the municipality (or unincorporated area) of _____
City of Chicago, in the County of Cook,
State of Illinois, at 121 N. La Salle ST. #107,
(identify location as precisely as possible)

when defendant violated plaintiff's civil rights as follows (***Place X in each box that applies***):

- ☐ arrested or seized plaintiff without probable cause to believe that plaintiff had committed, was committing or was about to commit a crime;
- ☐ searched plaintiff or his property without a warrant and without reasonable cause;
- ☐ used excessive force upon plaintiff;
- ☐ failed to intervene to protect plaintiff from violation of plaintiff's civil rights by one or more other defendants;
- ☐ failed to provide plaintiff with needed medical care;
- ☐ conspired together to violate one or more of plaintiff's civil rights;
- ☐ Other: Reverse Discrimination based on Origin of Nation to Illegal aliens

[If you need additional space for ANY section, please attach an additional sheet and reference that section.]

- _____.
7. Defendant officer or official acted pursuant to a custom or policy of defendant municipality, county or township, which custom or policy is the following: ***(Leave blank if no custom or policy is alleged)***: Civil Rights Violations enforced on myself, family and fellow U.S. citizen and True Share Holders of the State of Illinois.
- _____.

8. Plaintiff was charged with one or more crimes, specifically:

N/A

_____.

_____.

_____.

_____.

9. ***(Place an X in the box that applies. If none applies, you may describe the criminal proceedings under "Other")*** The criminal proceedings

- ☐ are still pending.
- ☐ were terminated in favor of plaintiff in a manner indicating plaintiff was innocent.¹
- ☐ Plaintiff was found guilty of one or more charges because defendant deprived me of a fair trial as follows _____.
- _____.

☐ Other: N/A

_____.

¹Examples of termination in favor of the plaintiff in a manner indicating plaintiff was innocent may include a judgment of not guilty, reversal of a conviction on direct appeal, expungement of the conviction, a voluntary dismissal (SOL) by the prosecutor, or a *nolle prosequi* order.

[If you need additional space for ANY section, please attach an additional sheet and reference that section.]

[If you need additional space for ANY section, please attach an additional sheet and reference that section.]

10. Plaintiff further alleges as follows: ***(Describe what happened that you believe supports your claims. To the extent possible, be specific as to your own actions and the actions of each defendant.)***

Here comes Hannibal Mu Bey on behalf of himself, his family and fellow

City of Chicago residents and True Share Holders of the State of Illinois.

Our Claim is based on the illegal engagement of actions that favors a group of people based on their National Origin to the disadvantage of the citizens of Chicago.

Racial classifications are simply too pernicious. Racial ambivalence is in fact a violation of the U.S. Constitution Equal Protection clause, which bars racial discrimination by

by Governmental entities. This is reverse discrimination, because foreign nationals are being prioritized for public services, food, housing, voting rights and jobs meant

for at risk youth. Citizens of Chicago are being harmed, because these services are not available to them despite having to fund these services with tax dollars.

In addition, our properties are being stolen and the titles are being transferred and being sold to people from foreign countries who are in the city illegally.

11. Defendant acted knowingly, intentionally, willfully and maliciously.

12. As a result of defendant's conduct, plaintiff was injured as follows:

Here comes Hannibal Mu Bey on behalf of himself, his family and fellow

City of Chicago residents and True Share Holders of the State of Illinois.

Are being denied City services, like access to police stations for months because of the illegal invasion, funding migrant program that do not benefit city residents..

13. Plaintiff asks that the case be tried by a jury. ☐ Yes ☐ No

[If you need additional space for ANY section, please attach an additional sheet and reference that section.]

14. Plaintiff also claims violation of rights that may be protected by the laws of Illinois, such as false arrest, assault, battery, false imprisonment, malicious prosecution, conspiracy, and/or any other claim that may be supported by the allegations of this complaint.

WHEREFORE, plaintiff asks for the following relief:

- A. Damages to compensate for all bodily harm, emotional harm, pain and suffering, loss of income, loss of enjoyment of life, property damage and any other injuries inflicted by defendant;
- B. ☐ (*Place X in box if you are seeking punitive damages.*) Punitive damages against the individual defendant; and
- C. Such injunctive, declaratory, or other relief as may be appropriate, including attorney's fees and reasonable expenses as authorized by 42 U.S.C. § 1988.

Plaintiff's signature: _____

Plaintiff's name (*print clearly or type*): Hannibal Mu Bey

Plaintiff's mailing address: 7613 S. Bennett Avenue

City Chicago State Illinois ZIP 60649

Plaintiff's telephone number: (305) 879-3114.

Plaintiff's email address (*if you prefer to be contacted by email*): _____

beyhannibal@gmail.com

15. Plaintiff has previously filed a case in this district. ☐ Yes ☐ No

If yes, please list the cases below.

Any additional plaintiffs must sign the complaint and provide the same information as the first plaintiff. An additional signature page may be added.